

# EPA IDENTIFICATION NUMBERS



*DTSC is one of six  
Boards and  
Departments within  
the California  
Environmental  
Protection Agency.  
The Department's  
mission is to restore,  
protect and enhance  
the environment,  
to ensure public health,  
environmental  
quality and  
economic vitality,  
by regulating  
hazardous waste,  
conducting and  
overseeing  
cleanups, and  
developing  
and promoting  
pollution prevention.*

State of California



California  
Environmental  
Protection Agency



## INTRODUCTION

The Department of Toxic Substances Control (DTSC) prepared this fact sheet to provide an overview of general information about EPA Identification Numbers. Throughout the online version of this fact sheet, numbers in blue ([66263.42](#)) represent citations from the California Code of Regulations or the California Health and Safety Code that are linked to databases containing those citations. Clicking on the blue numbers will take you to sites containing the regulations. If you generate hazardous waste, you should consult with your Certified Unified Program Agency (CUPA). Finally, DTSC strongly encourages all businesses generating hazardous waste to consider waste minimization, source reduction and pollution prevention.

## What is an EPA ID Number?

This number, issued either by the United States Environmental Protection Agency (U.S. EPA ID Number), or by the State of California Department of Toxic Substances Control (California EPA ID Number), identifies each handler on hazardous waste manifests and other paperwork. The ID Number enables regulators to track the waste from its origin to final disposal ("cradle to grave"). Note that these numbers are site-specific and there must be only one number at that business address. If you have a business that generates waste at multiple addresses that are not contiguous, each address needs a separate ID number. In the case where generators are independent businesses that operate in suites within the same building, each business must have their own ID number. If you are not clear as to whether you operate on one site or multiple sites, contact your local [Environmental Agency](#) or the DTSC information resources listed at the end of this fact sheet.

## Who has to have an EPA ID Number?

Since an ID Number is required to offer waste for transportation, most hazardous waste generators must have an ID Number; however, several types of generator, described below, are exempt from this requirement. All hazardous waste transporters and permitted treatment, storage and disposal facilities (TSDFs) must have ID Numbers.

## **What is the basis of the requirement to have an EPA ID number?**

The U.S. EPA authorized California to administer the federal regulations through the California Environmental Protection Agency, Department of Toxic Substances Control. Federal law controlling these wastes is found in the Resource Conservation and Recovery Act (RCRA) (42 United States Code section 6901 et seq.), so federally-designated wastes are called “RCRA” wastes. California’s RCRA-equivalent laws are codified in the Health and Safety Code, division 20, chapter 6.5 (Hazardous Waste Control Law). The federal regulations that detail hazardous waste requirements are found in 40 Code of Federal Regulations sections 260 through 279. California’s equivalent regulations are found in the California Code of Regulations, title 22, division 4.5.

## **Is there such a thing as a California ID number, and do I need one?**

The federal act also allows states to enact their own hazardous-waste laws, which must be no less stringent than the federal, but may be more so. The State of California exercised its discretion to further protect its people and environment by making the toxicity characteristic more stringent than the federal criteria, and by adding to other characteristics of hazardous wastes. Wastes that pass the federal hazardous waste criteria but fail the California criteria are called “non-RCRA”, or “California-only” hazardous wastes. Wastes containing corrosive solids, asbestos, nickel or zinc are examples of common California-only/non-RCRA hazardous wastes.

“California-only” means just that; other states may not consider California-only wastes as hazardous. If you only generate non-RCRA wastes, or less than 100 kilograms of RCRA waste per month (see below), you must get a California EPA ID Number. If you generate more than 100 kilograms of RCRA waste per month, then you must get a US EPA ID Number.

## **Am I exempt from the requirement to get an EPA ID Number?**

You are exempted by U.S. EPA from many of its regulations, including the requirement to have an EPA ID Number, if you generate no more than 100 kilograms of RCRA waste per month (that is, about 220 pounds or 27 gallons) or one kilogram per month of federally-listed acutely hazardous waste per month and meet certain other requirements. These businesses are called “conditionally exempt small-quantity generators”, or CESQGs. The regulatory citation is 40 Code of Federal Regulations section [261.5](#)

The State of California has more stringent regulations for all generators, including CESQGs. Almost all business generators of hazardous waste in California that are not required to have a federal EPA ID Number must, in practice, have a California one. See California Code of Regulations title 22, section [66262.12](#). However:

1. Generators handling only hazardous waste produced incidental to owning and maintaining their own place of residence do not need any EPA ID number, federal or state.
2. Businesses whose ONLY hazardous waste generation is 100 kilograms or less per month of waste that is hazardous solely

because of its silver content (“silver-only waste”) do not need an EPA ID number. This is true even if they treat the waste in silver-recovery units and then send the silver for reclamation. See Health and Safety Code section [25143.13](#); **Also see the DTSC Fact Sheet, “Small Quantity Generators - Dental, Medical and Veterinary”.**

3. Persons who Generate ONLY universal waste and manage it as such also do not need an EPA ID number.

### **I used to be exempt from ID number requirements. What happened?**

The passage of [Senate Bill 271](#) (effective January 1, 2002) removed the exemption that once allowed small generators of used oil and solvents to offer waste for transport without an EPA ID number (former milkrun or modified manifest procedures).

### **How do I get an EPA ID Number or California ID Number?**

Note that there must be no more than one EPA ID number for any business site.

Handlers of RCRA waste who need an EPA ID Number must send a “Notification of Regulated Waste Activity”, form 8700-12, to the U.S. EPA contractor at the address given in its instructions. This form can be requested by calling **(415) 495-8895**, or you can download the form from [U.S. EPA](#) web site.

Handlers who do not need the federal number but do need a state one can obtain it by calling DTSC's Generator Information Services Section at **(800) 618-6942**. From outside of California, call **(916) 255-1136**.

DTSC staff will provide a California ID number during the call and will send a written confirmation shortly afterwards. There is no charge for issuance of the number, but DTSC is required to collect an annual verification fee, which is based on the number of employees in the entire organization. If your business has fewer than 50 employees, the fee is zero. DTSC has an [EPA ID Verification Questionnaire FAQ](#) that specifically addresses frequently asked questions about EPA ID Number Verification Questionnaires and EPA ID Number and Manifest Fees.

### **I usually don't generate hazardous waste, but I recently generated some. Can I get a temporary EPA ID Number for this one time event?**

Permanent numbers are issued to handlers who expect hazardous waste activity to be ongoing, while temporary (or “provisional”) ID Numbers are issued to people or businesses that do not routinely generate hazardous waste. Such activities include removal of hazardous wastes abandoned in a leased building, removal of underground tanks, asbestos abatement, etc. A California provisional number is only valid for non-RCRA (California only) waste and when the total RCRA waste hauled is less than 220 pounds or 27 gallons per month. U.S. EPA also issues provisional numbers for non-routinely generated federal wastes. The provisional numbers are valid for a maximum of 90 days but can be used to haul any amount of hazardous waste that has been generated at the site before and during that period.

## Do I need to get a new number if I move my business?

Yes. If you have a California ID number, call DTSC at 800-618-6942 [from out of state call (916) 255-1136] to deactivate your old number and have a number issued for your new location. This is true if you are selling or buying a business as well; please call DTSC to inactivate the old number and reissue one in the name of the new owner. If you have a federal ID number, you will need to deactivate your old number and submit a "Notification of Regulated Waste Activity" for your new location.

## I've always wondered: do the letters in front of the numbers mean anything?

Early federally-issued numbers had two letters corresponding to the generator's state and ten digits. Current numbers consist of three letters followed by nine digits. The significance of those letters is as follows:

### EPA ID Numbers

- CAR Federal permanent number currently being issued.
- CA Federal permanent number that preceded the CAR prefix. ID numbers with a CA prefix are still valid, but have not been issued since February 1995.
- CAD Federal permanent number that preceded the CA prefix, or a State permanent or provisional number issued before 1988. ID numbers with a CAD prefix have not been issued since August 1993.
- CAT Federal permanent number that preceded the CAD prefix.
- CAP Federal provisional or emergency number currently issued.

### California ID Numbers

- CAL State permanent number.
- CAC State provisional or emergency number.
- CAH State provisional or permanent number issued for Household Hazardous Waste Collections.
- CAI State permanent number issued for Exotic Pest Detection.
- CAE State provisional number issued for removal of hazardous waste caused by a natural disaster.
- CAS State permanent number issued for Emergency Response.
- CLU Clandestine Drug Lab cleanup.
- CAX State permanent or provisional number issued before 1987. A CAX number is no longer a valid ID number.

DTSC Public and Business Liaisons provide informal guidance only regarding management of hazardous waste for the convenience of the public. Such advice is not binding upon DTSC, nor does it have the force of law. If you would like a formal opinion on a matter by DTSC, please contact the responsible program office directly.

You should also refer to the statutes and regulations, DTSC Policies and Procedures, and other formal documents.

If you cannot find the answer to your question in this fact sheet, contact your local DTSC Public and Business Liaison directly. You can reach them toll-free at 800-728-6942, or contact them via the Department of Toxic Substances Control website—<http://www.dtsc.ca.gov>.

We also encourage you to complete a Cal/EPA Customer Satisfaction survey (<http://www.calepa.ca.gov/about/custsvc.htm>). Your feedback can help us to provide better service.